



Division of Public Health Services

Public Health Preparedness Services

Bureau of State Laboratory Services

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FAX TRANSMITTAL SHEET

DATE: November 02, 2007

TO: Laboratory Director and QA Manager

FROM: Steven D. Baker, Office Chief
Laboratory Services
State Laboratory Services

Subject: Information Update #97

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***THIS MESSAGE AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST, BY CONTACTING:
Prabha Acharya AT (602) 364-0734.***

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Leadership for a Healthy Arizona



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Information Update

November 02, 2007

Update #97

1. The office continues to perform unannounced routine audits, which was initiated in June, 2007. The goal is to visit the laboratory to see the normal operation on any given day when the compliance testing is being analyzed. Although a laboratory director, quality assurance officer or key analyst may not be present, if compliance testing is being performed, then there must be an assigned/designated person who should be capable of providing information relevant to their duties during an on-site visit.

The surveyors will begin with the review of the laboratory bench documentation so an entrance interview may be delayed. Although not all inclusive, following is an example of an order of review:

- i. Daily temperature log records for refrigerators, freezers, incubators, ovens, etc. Some of the records may be on the analytical worksheets, particularly for residue, digestions or BOD analyses.
- ii. Daily balance log records, including monthly and annual re-certifications.
- iii. pH, turbidity, conductivity, etc. meter calibrations and documentation.
- iv. Standard traceability, especially for those standards that are made up frequently.
- v. Selection of compliance data for review. Since it is unannounced, recent data that has been completed is acceptable. Depending on the scope of accreditation, one or two samples per licensed method should be sufficient.
- vi. Request to provide current SOP, QAP and CHP for review. It is desired that the laboratory provide copies of the documents on a CD so that the surveyor may keep for later review.
- vii. If a key analyst is not available to discuss a particular method and no one else is familiar with it, the surveyor might request that the analyst provide the information, particularly electronic data, on their return.

If you have any questions or concerns please contact the Environmental Program Manager, Barbara Escobar at escobab@azdhs.gov or at 520-903-1620.

2. The Arizona Data qualifiers Revision 3.0 :

The updated version is ready to be implemented. You can access the files on the ADHS website <http://www.azdhs.gov/lab/license/tech/infoup.htm>. You will notice that there are two files, AZ Data Qualifiers Rev 3.0 (changes in color) and AZ Data Qualifiers Rev 3.0 (clean copy). As the titles suggest, one is color coded for easier tracking of changes from the previous revision and the other is a clean copy. The guidelines from ADEQ for implementation are copied below:

ELAC's technical subcommittee for data qualifiers has developed AZ Data Qualifiers Revision 3.0 to be used when qualifying analytical results for use in Arizona. The technical subcommittee is comprised of Arizona Department of Environmental QA (Quality Assurance) Unit, Arizona Department of Health Services-Office of Laboratory Licensure, Certification and Training, and representatives from both private and municipal Arizona environmental laboratories.

Originally, the purpose for developing a standardized set of data qualifiers was to assist ADEQ project managers in assessing data quality and standardize entries into ADEQ's databases. The ELAC technical subcommittee endeavored to ensure that each data qualifier was succinct and narrow in scope to eliminate broad or multiple interpretations when assessing the impact on data. The subcommittee has continued the effort with revision 3.0 of the qualifiers and has fine tuned a few parameters based on minor method changes and feedback from laboratories utilizing the qualifiers.

Data submitted to ADEQ since January 1, 2001 have required designating using the Arizona Data Qualifiers. Laboratories may begin using Revision 3.0 qualifiers immediately but should completely incorporate Revision 3.0 by January 1, 2008.

Because the data qualifiers are specific, there may be multiple qualifiers assigned to each analytical result. Any events that cannot be described by the data qualifiers must be documented in a case narrative which must be included with the final report. Using the Arizona Data Qualifiers does not automatically qualify the data as acceptable to the Agency.

3. **Director Approval:**

ADHS has Director Approved to add n-hexane to the target analyte list of SW 846 Method 8260B in response to a request by Jeanene P. Hanley, Tanks Programs Division, Corrective Actions Section, ADEQ. The laboratories interested in adding n-hexane to their 8260B license must send a written request to the licensure office; there will be no additional charge for adding n-hexane.

ADEQ would like a PQL of 55 mg/kg, since the SRL for both residential and non-residential is 110 mg/kg. The same applicable QC criteria specified in the referenced method must be applied for the analysis of hexane.

4. We were informed by Julie Hoskin of ADEQ that the method 8015AZ remains as a compliance testing for the hydrocarbon ranges; it was the TPH which was removed from the Soil Remediation Levels.

5. **Procedures to determine Composite sample result for VOC analysis:**

When a permit is issued with the following statement for VOCs: "Samples for Volatile Organic Compounds must be collected as 4 discrete samples and composited per approved methods by the laboratory running the analyses", there are two options available:

- i. Results of analyses of 4 individual composite samples may be averaged to produce a "composite."

- ii. Alternatively, grab samples may be collected in the field and composited in the laboratory **if** the compositing procedure produces results equivalent to results produced by arithmetic averaging of the results of analysis of individual grab samples. For examples of laboratory compositing procedures, see EPA Method 1664A (oil and grease) and the procedures at 40 CFR 141.34(f)(14)(iv) and (v) (volatile organics).

Please see the footnote 2 on Table II, on page 40 of the document (Federal Register page 11238), in the Methods Update Rule (<http://www.epa.gov/fedrgstr/EPA-WATER/2007/March/Day-12/w1073.pdf>) for more details.

6. **“Dissolved” parameters** (as communicated by the EPA Contractor for wastewater testing):

The time frame for filtering samples for dissolved metals, sulfide, phosphorous and other dissolved parameters is 15 minutes. Samples must be filtered within 15 minutes of collection. Footnote 4 to Table II, in the Methods Update Rule, allows a discharger/permittee to hold a sample for a longer period only if the permittee or monitoring laboratory has data on file to show that, for the specific types of samples under study, the analytes are stable for the longer time, and has received a variance from the Regional Administrator under § 136.3(e).

The objective is to prevent inter-conversion between suspended and dissolved forms of the metal or other parameter. Holding the sample for hours may allow the inter-conversion unless it is demonstrated not to.

The answer is to have the manufacturer of the discrete sampler include filtration in sample collection so that each sample (or the composite) is filtered as it is collected. EPA's Method 1669 Sampling Guidance has procedures in it for filtering samples for metals during collection.

7. **Chemstation “bug”:**

We were notified by a licensed lab to be aware of a problem with the Chemstation software;

“....the Organics Manager... installed Chemstation G1701EA E.01.01.335 on 08/21/07 and noticed a bug in the software on 10/18/07 that causes previous method saves to be discarded. Apparently it's related to the "user interface" (the Edit Compounds window that you use to evaluate the initial calibration). The "E" version of the software has a new user interface, which appears to be helpful, but Agilent hasn't worked out all the bugs. Kerri's provided two files where you can see the problem. The first page in file ENVQ.pdf shows the method saved on 10/08/07, but when you close the program and re-open the method, the second page in the pdf shows that the method is saved on the original date 09/25/07...but with the data from 10/08/07. It appears that the data in the method would be correct, until you look at the curve reports, shown in ENVQ2.pdf. Kerri contacted Agilent and received instructions to change the software back to the old user interface, and as far as we can see, it operates correctly with this change. We've made sure to document all of these problems, but thought it might be helpful to notify ADHS about these activities.”

8. **Laboratory's licensed parameters search feature on ADHS website:**

The Office of Laboratory Services now has the option of finding licensed laboratories in all licensable programs by going to <http://www.azdhs.gov/lab/license/index.htm> or <http://www.azdhs.gov/lab/license/env.htm> and selecting Arizona List of Licensed Laboratories with Parameters. There is a security alert, which you click “OK” and it will take you to the search

page. Searches may be conducted by “State”, “Program”, “EPA Method”, or a combination of any of the three. The information on the web page is updated every 24 hours.

- i. State, Program, EPA Methods – The default is all states, programs, and methods. If you click on the arrow button, you will see a list of state abbreviations that have Arizona licensed laboratories, or a list of programs, or a list of currently licensed methods. Select the criteria you are searching for and then click on “Get Facility List” and a list will be created. Laboratories are organized alphabetically by city and then state.
- ii. Once you have a facility list, click the “Select” option next to the laboratory name which you would like to review further. Scroll down the screen and the laboratory’s license number, address, phone number, type and which programs the lab is licensed in will appear.
- iii. If you wish to review the parameter list for the selected laboratory, click on “Get Parameters” and the laboratory’s list of certified parameters will appear.
- iv. If the laboratory’s list of parameters is greater than 10, you will see an option for multiple pages (1,2,3,...) or you can select “De-Activate Parameter Grid Paging” and get the complete list on one page.

9. **Your input is requested:**

The Office of Laboratory Services has been given an opportunity to discuss with ADHS IT staff the possibility of having an interactive Environmental Laboratory Licensure Application on our website. This is in the preliminary stages and in order to provide the best possible information to our IT Office, Laboratory Services would like to obtain information from the laboratory community on what features would be necessary, beneficial or nice to have for filling the application on-line.

What types of functions would you like to see available if we provided the opportunity to fill out the application and method additions/deletions on-line? Examples of other state on-line applications that you find easy to use or helpful, please let us know about.

Please e-mail responses to wangsnk@azdhs.gov or fax (602) 364-0759. Thank you.

10. **Correction:**

In the Information Update 87, it was erroneously stated that the MDL studies were not required for COD analysis; MDL studies are required.

11. Please contact Prabha Acharya @ (602) 364-0734 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ <http://www.azdhs.gov/lab/license/tech/infoup.htm>